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CORY SPENCER, DIANA MILENA  
REED, and COASTAL PROTECTION  
RANGERS, INC.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

CORY SPENCER, et al.  
Plaintiffs,

v.

LUNADA BAY BOYS, et al.  
Defendants.

CASE NO. 2:16-cv-02129-SJO (RAOx)

**NOTICE OF MOTION TO COMPEL  
DEFENDANT, SANG LEE'S  
PRODUCTION OF DOCUMENTS**

[Filed concurrently With: Joint Stipulation  
Regarding Plaintiffs' Motion to Compel  
Production of Documents; Declaration of  
Victor Otten]

Judge: Hon. Rozella A. Oliver  
Date: September 6, 2017  
Time: 10:00 am  
Crtrm.: F, 9<sup>th</sup> Floor

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on at 10:00 a.m., on September 6, 2017 in the courtroom of the Honorable Rozella A. Oliver, located at 312 North Spring Street, Los Angeles, California, 90012, in Courtroom F, 9<sup>th</sup> floor, Plaintiff Cory Spencer, Diana Milena Reed, and Coastal Protection Rangers will and hereby does move pursuant to Fed. R. Civ. P. 37(a) for an order compelling Defendant, Sang Lee to produce documents. Plaintiffs further request that this Court order Mr. Lee and his attorney to pay Plaintiffs' counsel's fees and costs incurred because of his refusal to respond to Plaintiffs' document requests. There is no justification for his failure to produce any documents in response to Plaintiffs' requests. Accordingly, Plaintiffs are entitled to recover their reasonable expenses. Fed. R. Civ. P. 37(a)(5).

Prior to filing this Motion, the parties have met and conferred pursuant to L. R. 37-1, and made a good faith attempt to resolve this dispute but were unable to do so.

This Motion to Compel is based upon this Notice, the concurrently filed Joint Stipulation Regarding Plaintiff's Motion to Compel documents, the declaration of Victor Otten filed in support of the Joint Stipulation, the pleadings and records on file in this action and such other matters as the Court deems necessary and proper.

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OTTEN LAW PC

DATED: August 7, 2017

By: /s/ Victor Otten

VICTOR OTTEN

KAVITA TEKCHANDANI

Attorneys for Plaintiffs

CORY SPENCER, DIANA MILENA  
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